

PCA Summary Report for Audit Date of July 15, 2014

Antrim Township is providing the below response to Sections 12.1 and 12.2 of the PCA Summary Report for the Pretreatment Compliance Audit that was conducted July 15, 2014. The findings of the Summary Report are shown below and numbered according to how they were presented in the report with Antrim's response indicated by *italics*.

12. Summary of Requirements and Recommendations

Listed below are requirements and recommendations resulting from the audit of the Township's pretreatment program. For more specific information pertaining to each comment, see the cited sections of the report.

12.1 Requirements

1. According to Township personnel, the Township is evaluating its local limits and recently submitted its local limits report to EPA Region 3. The Township must follow the approval procedures for pretreatment program modifications at 40 CFR 403.18(c). (Section 4, Pretreatment Program Modifications).

The Township's revised Local Limits were accepted by EPA and followed the approval procedures for pretreatment program modifications outlined at 40 CFR 403.18(c) as documented in EPA Public Notice Number PA-400-SGC. (Attachment 1)

2. As a result of finding from both the interview and file review portions of the audit, the audit team found discrepancies in the Township's SUO. It is recommended that the Township address each of these issues. Please note that any changes in the SUO as a result of correcting these discrepancies must be reported to the Approval Authority in accordance with 40 CFR 403.18. (Section 5, Legal Authority).

The Township is in the process of reviewing its Sewer Use Ordinance and will make modifications as necessary. Changes made to the SUO will be reported to the Approval Authority in accordance with 40 CFR 403.18. See also response to Requirement #5.

3. During the interview, Township personnel indicated that they had no CIUs. The Township's 2013 annual report and the subsequent site visit to Grove-Manitowoc Crane, however, revealed that the facility is a CIU subject to 40 CFR Part 433. The Township is required to improve its procedures for characterizing its nondomestic dischargers to ensure proper categorization and proper implementation of categorical standards. (Section 6, Nondomestic Discharger Identification Characterization).

The Township has added Section B.13 to their Industrial User Wastewater Discharge Application which requires a response from the application as to if a site inspection has occurred, and if so the IU is to provide date of the inspection, names of individuals present for the inspection and their affiliation (Attachment 2). The purpose of this is to ensure that a site inspection has been or will be performed to confirm the accuracy of the information provided by the IU on the application and ensure the IU is correctly characterized. In addition, Antrim has hired a consultant to assist in the review of IU applications and to participate in IU inspections to confirm that what was reported by the IU in the IU application is accurate and to correctly characterize the IUs.

4. The Township incorrectly permitted Grove-Manitowoc Crane as a non-categorical SIU. Therefore, the Township is required to revise Grove-Manitowoc Crane's permit to incorporate

all federal pretreatment standards and requirements for 40 CFR Part 433 facilities. (Section 7.1 Facility Classification).

Grove's IU permit expired 12-31-2015 and the Township is currently in the process of issuing a revised permit. The Township received a completed Industrial User Wastewater Discharge Application and provided comments on the information submitted. A draft permit was issued in February 2015 to the IU for review. As a result of the findings provided in this PCA Summary Report, the draft will be revised to incorporate applicable federal pretreatment standards as per 40 CFR Part 433 for Metal Finishing.

5. The file reviews of Grove-Manitowoc Crane and Eldorado Stone revealed that the local limits in the permits are not consistent with the local limits established in the SUO. Therefore, the Township is required to review its SUO and its local limits development document to determine how the established local limits must be applied and revise the SIU permits accordingly. If the Township wishes to apply both daily maximum and monthly average local limits, it must ensure that it has established adequate legal authority to do so. (Section 7.2.1, Daily Maximum and Monthly Average Limits).

It is unclear as to why the local limits in the SIU permits are inconsistent with the local limits established in the SUO. The SIU Permits for Grove and Eldorado Stone will be amended to be consistent with the currently effective local limits that are established in the SUO. The current SUO contains a uniform concentration local limit; however in March 2016 the Township received Board approval to revise the SUO to reflect adoption of the MAIL in place of the uniform concentration limit. Antrim was notified by EPA that this change to adopt the MAIL in lieu of the uniform concentration limit constitutes a major modification to its pretreatment program, and therefore the approval procedures outlined at 40 CFR Part 403.18(c) will be followed to obtain approval. After approval is granted, Antrim will allocate the MAIL on an industry-by-industry basis via the SIU permits. The Township intends to apply daily maximum local limits through the SIU Permits as per the recommendations set forth in EPA's Local Limits Development Guidance (July 2004) and EPA's Industrial User Permitting Guidance Manual (September 2012). For those industries classified as categorical, IU permit limits will also include the applicable frequency as per federal categorical pretreatment standards. Due to other changes to the SUO that need to be addressed as pointed out in this Audit Report, all changes to the SUO will be compiled and acted on at one time and will be reported to the Approval Authority as per 40 CFR 403.18.

6. Both permits reviewed contain total suspended solids (TSS) local limits that are less stringent than the TSS limit established in the Township's SUO. Section 111.8 of the SUO, which lists the Townships local's limits, does not discuss allowance of alternative local limits derived on a case-by-case basis. Therefore, the local limits for TSS in both permits are incorrect and the Township is required to revise the permits to include the TSS established in the SUO. (Section 7.2.2, Total Suspended Solids)

The Township will amend both SIU Permits to reflect current local limits established in the Township's SUO.

7. The Eldorado Stone permit contains insufficient self-monitoring requirements. Therefore, the Township is required to revise Eldorado Stone's permit to require monitoring for all pollutants of concern at least once every six months. (Section 7.3, Sampling Requirements).

Eldorado Stone's permit will be amended to include limits for all local limit pollutants and will include a monitoring frequency of at least 1/6 months for those pollutants.

8. Both of the permits reviewed contained incomplete sample location descriptions. The statement in the permit regarding sample location is a placeholder for a sample location schematic and description, but the permit does not include any schematics or descriptions of

the applicable sampling location. Therefore, the Township is required to revise all SIU permits to include an adequate sample location description. (Section 7.4, Sample Location).

All SIU permits will be amended to include a detailed sample location description, photo of the sample location, and to identify the sample location on a schematic of the facility.

9. The Grove-Manitowoc Crane permit does not include the requirement to develop and implement a slug discharge control plan. The Township previously determined that such a plan was necessary and therefore, the facility's permit must contain the requirements to control slug discharges [40 CFR 403.8(f) (I) (B) (6)] and the Township must ensure that the SIU develop and implement the slug discharge control plan. (Section 7.5, Slug Discharge Control Requirements).

Grove included a copy of their PPC Plan with their completed Industrial Wastewater Discharger Application materials that they submitted to the Township in November 2014 (Attachment 3). The PPC Plan contains a "Contingency Plan for Hazardous Material Spills" which covers slug discharges. The Township is in the process of reviewing this Plan to determine if it contains the required elements of a slug discharge control plan per 40 CFR 403.8(f)(2)(vi). Once approved, the Township will provide reference to this Plan in Grove's draft IU permit.

10. The Township is not requiring Grove-Manitowoc Crane to comply with all applicable pretreatment standards and requirements. The Township is required to revise Grove-Manitowoc Crane's permit to include all applicable requirements and ensure that the facility complies with all pretreatment standards and requirements. (Section 8, Application of Pretreatment Standards and Requirements and Section 9.3, Facility Site Visits Conducted During the Audit).

See response to Requirement #4.

11. The Township has not permitted or conducted the appropriate compliance monitoring of one of its SIUs, Mountain View Landfill. The Township is required to regulate the discharger accordingly, which includes issuing the facility a permit and conducting required compliance sampling and inspections. (Section 8, Application of Pretreatment Standards and Requirements).

The Township is in the process of issuing an IU permit to Mountain View Landfill. The Township received a completed IU Wastewater Discharge Application from Mountain View Landfill in May 2015. The application was reviewed and comments were provided to Mountain View in August 2015 regarding additional information required in order to satisfy the Township's requirements. A response to these comments was received from the Landfill in March 2016. The Township is currently reviewing their response and anticipates issuing a Draft SIU permit in the coming months.

Attachment 4 contains a copy of the Landfill's IU Wastewater Discharge Permit Application and follow-up correspondence.

12. The Township did not conduct any compliance sampling of its permitted SIUs in 2013. This contradicts the information in the Township's 2013 annual report that states Grove-Manitowoc Crane and Eldorado Stone "was sampled by Antrim Township via Franklin Analytical by split sample." The Township is required to review its procedures and frequencies for compliance sampling and ensure that it complies with compliance monitoring requirements at 40 CFR 403.8(f) (2) (v). The Township is also required to correct and resubmit its 2013 annual report to EPA Region 3. (Section 9.1, Compliance Sampling).

In order to improve upon the Township's procedures for compliance sampling, the Township will conduct its compliance sampling as part of its annual inspection for each SIU. Also, effective immediately, the Township will begin to use a new IU Inspection Form during the site inspections that has a section related to IU monitoring. Section F of the IU inspection form contains a series of questions pertaining to compliance monitoring including if sampling was conducted during the site inspection and if the samples were split with the IU. A copy of the IU Inspection Form is included as Attachment 5; see Section F of the attachment pertaining to monitoring.

13. The file review revealed that the Township is using incorrect sample analysis methods for cyanide and phenolics. The Township is required to review its sample analysis methods and ensure that analysis for cyanide and phenolics, as well as all other pollutants, is performed in compliance with the methods listed at 40 CFR Part 136. (Section 9 .1, Compliance Sampling).

Following the Audit, Antrim changed labs and corrected the methods used for its local limits testing for cyanide and phenolics. A review of the methods ALS Environmental Labs uses for Antrim's Local Limits testing was conducted. This review confirmed that ALS is using EPA-approved test methods for all of the local limit parameters per 40 CFR Part 136. A copy of the lab report from the 2015 4th Quarter Local Limits testing is included as Attachment 6 showing adherence to EPA-approved test methods. Antrim will remain vigilant in reviewing the lab reports to ensure EPA-approved test methods continue to be used.

14. The Township failed to collect compliance samples for all pollutants of concern during its compliance sampling events at Eldorado Stone and Grove-Manitowoc Crane. The Township is required to collect compliance samples for all pollutants of concern as established in each SIU's permit at least once per year as required at 40 CFR 403 .8(f) (2) (v). (Section 9 .1, Compliance Sampling).

Effective immediately, the Township will collect compliance samples for all pollutants of concern during compliance sampling events of its SIUs. All pollutants of concern established in each SIU's permit, including the most recently adopted local limit pollutants, will be sampled at least once per year.

15. The compliance sample results provided by the Township did not include chain-of-custody forms or otherwise document the procedures used to collect the compliance samples. The Township is required to review and document its sample collection procedures, sample preservation methods, and quality assurance procedures to ensure that they can demonstrate that the results of their compliance samples are admissible in enforcement proceedings or judicial actions as required at 40 CFR 403.8(f)(2)(vii). Also, the Township must document records of monitoring activities as specified at 40 CFR 403.12(0). (Section 9.1, Compliance Sampling).

Sampling procedures for the Township's compliance samples have been modified since the Compliance Audit was conducted in July 2014. Presently, the Township utilizes an accredited lab to conduct the compliance monitoring of its permitted SIUs. Either the lab or Township staff will physically collect the sample. The sample is then submitted to the lab for analysis. In either case, the person responsible for collecting the sample completes the appropriate portion of the Chain of Custody and then forwards it to the accredited lab for further execution by lab personnel. Copies of fully executed Chains of Custody are maintained in the Township's records for each SIU.

16. Township personnel were unable to provide documentation of any compliance inspections at Grove-Manitowoc Crane. The Township is required to conduct and document inspection activities at its SIUs as required at 40 CFR 403.8(f) (2) (v). As required at 40 CFR 403.8(f) (2) (vii) the collection of information must be performed with sufficient care as to produce

evidence admissible in enforcement proceedings or in judicial actions. The Township is required to develop inspection documentation procedures to ensure that all compliance inspections are conducted as required, adequately documented, and that the documentation is readily accessible when needed. (Section 9.2, Compliance Inspections).

After the Compliance Audit was conducted, Antrim was able to locate one compliance inspection report for Grove from 8-29-2012. A copy of this inspection report is included as Exhibit 18-1 of Antrim's response to the Information Requirement. As referenced in the response to Requirement #12, effective immediately, the Township will use a new IU Inspection Form during the annual site inspections of the SIUs (Attachment 5). This form will be used during the actual site inspection and will serve as a checklist to the individual performing the inspection. The completed form will then be used to prepare the formal Industrial Inspection Report that is submitted to the SIU for signature. The Industrial Inspection Report form is a Microsoft Word document. After this form is completed it will be saved electronically in the Township's files. An electronic copy and a hard copy of the signed Industrial Inspection Report and will be kept on file at the POTW. Retention of the hard copy will aim to eliminate the possibility of being unable to access previous inspection reports due to a change in software at the Township.

17. The Township is required to provide more information in its inspection documentation so that it is clear that the Township is adequately conducting surveillance activities in order to verify compliance with pretreatment standards as required at 40 CFR 403.8(f)(2)(v). Further, the Township must collect and document information with sufficient care as to produce evidence admissible in enforcement proceedings or in judicial actions, as required at 40 CFR 403.8(f)(2)(vii). (Section 9.2, Compliance Inspections).

Refer to the response to Requirement #16 above and Attachment 5.

18. The file reviews revealed that the Township is inadequately reviewing all SIU self-monitoring reports to ensure compliance with reporting requirements. The Township is required to improve its procedures for reviewing self-monitoring reports to ensure all reporting and effluent violations are properly identified. (Section 9.4.1, Self-monitoring Reports).

The Township will send formal letters to each permitted SIU reiterating their self-monitoring requirements, dates for submitting the self-monitoring reports to the Township, requirement of the certification statement to be signed by the SIU, and a reminder of enforcement actions the Township is required to take should violations occur. A copy of the ERP will be included for their reference. This correspondence will also include a copy of their discharge monitoring report (DMR) for the SIU to use when submitting their self-monitoring data to the Township.

The letter will serve as a review to Antrim Township pretreatment staff of their permitted SIUs self-monitoring requirements and the various enforcement response actions that Antrim is required to take depending on the violation that occurred.

Attachment 7 includes an example letter that will be sent to the permitted SIUs.

19. The file reviews revealed that the Township is not adequately reviewing its compliance monitoring results. The Township is required to improve its procedures for reviewing compliance monitoring reports to ensure that all violations are properly identified. (Section 9.4.2, Compliance Monitoring Reports).

In the past, the Township would sometimes verbally notify an SIU of a violation with little or no follow-up or documentation of that notification. In an effort to improve upon the quality and timeliness in reviewing compliance monitoring reports and providing documentation of that review, the Township's Pretreatment Coordinator(s) intend to engage its pretreatment

consultant to assist in reviewing Compliance Monitoring Reports received by the Township and to assist in identifying violations based on their review. A Compliance Monitoring Report Log will be utilized by Township staff to log the receipt, review and violation notification means to better track its compliance status of each of its IUs. An example of this Log is included as Attachment 8.

20. The Township did not provide chain-of-custody forms and laboratory reports from the SIUs to the auditors for review. The Township is required to assess all SIU self-monitoring reports to ensure that the SIUs' self-monitoring collection and sample analysis procedures are in compliance with the requirements with 40 CFR Part 136 [40 CFR 403.12(g)(3)] and submit this assessment to EPA Region 3. The assessment must also describe Township procedures for ensuring that SIUs are in compliance with sampling protocol as required at 40 CFR Part 136. The Township can conduct the assessment through careful review of the SIUs' self-monitoring reports or through review of industrial user documentation during the annual inspection. If the assessment is conducted during the annual inspection then the inspection report must also document the assessment. (Section 9.4.3, Chain of Custody and Laboratory Reports).

The Township obtained chain-of-custody forms (COC) and lab reports as part of its response to #17 of the Information Requirement. See Information Requirement Response #17 and associated exhibits for copies of COCs and lab reports.

After notifications are sent as described in the response to Requirement #18, and the Township begins to receive the self-monitoring reports on the DMR form prescribed by the Township, the Township will initiate its assessment of SIU self-monitoring reports. It is anticipated that the Township will perform this assessment during the annual inspection process. The annual Industrial Inspection Report (see response to Requirement #16) will include a summary of the assessment and will be updated on an annual basis to coincide with the annual inspection.

21. The Township is not adequately evaluating each of its SIUs to determine whether the SIU needs to develop and implement a slug discharge control plan. The Township is required to ensure that it has adequate procedures for evaluating and documenting the evaluation of each SIU's need to develop and implement a slug discharge control plan. Further, the Township is required to conduct an assessment of the need for a slug discharge control plan at each of its SIUs, as required at 40 CFR 403.8(f)(2)(vi), and submit the assessment to EPA Region 3. (Section 9.5, Slug Discharge Control Plans).

Effective immediately, the Township will evaluate the need for a slug discharge control plan for new SIUs during the initial industrial discharger application review process. Section G of the Township's Industrial User Wastewater Discharge Permit Application addresses spill/slug discharges (Attachment 2). Reassessments of the need for a slug discharge control plan will occur during the annual site inspection, at the time of permit renewal, and/or as necessary should the Township be notified by the SIU of changes that could impact the potential for a slug discharge.

The following provides an update relative to SIUs in the Township's service area and the status of their slug discharge control plans:

- *Grove was previously identified as requiring a slug discharge control plan as discussed in Requirement #9. Grove has since submitted their PPC plan which contains a section relating to slug/spill discharges. This Plan is currently under review by the Township (see response to Requirement #9 and Attachment 3).*

- *Mountain View Landfill submitted a copy of their PPC Plan as part of their Industrial User Wastewater Discharge Permit Application submittal (Attachment 4). The Landfill's PPC Plan is currently under review to determine if it contains the required elements of a slug discharge control plan per 40 CFR 403.8(f)(2)(vi).*
 - *Eldorado Stone indicated that they do not have a slug discharge control plan per their original IU Wastewater Discharge Permit Application that was submitted in 2009. Additionally, per Part III, Section 2.E of Eldorado Stone Permit No. WWDP # 09-001 (Effective 12-7-2014), Eldorado Stone is not required to submit a Slug/Spill Control Plan. However, due to insufficient documentation indicating why they are not required to submit a slug control plan, the Township will issue a request for information to Eldorado Stone to provide updated information relative to Spill Prevention. The Township will include a copy of Section G of the IU Permit Application (Attachment 2) to be completed as part of the request for information.*
22. Township personnel were unaware that the Township had an ERP. The Township is required to implement its approved ERP when it investigates and responds to SIU noncompliance. (Section 10, Enforcement).
- Though Township personnel were unaware of the ERP when questioned during the Audit, they have generally followed the means of enforcement action, both formal and informal methods, when noncompliance was acted upon. Copies of the EPA-approved ERP dated 1/26/2004 were distributed to the pretreatment coordinators. Effective immediately, Antrim Township will implement the ERP and maintain records of all noncompliance and enforcement actions, both formal and informal.*
23. The file review revealed that the Township has not taken any enforcement actions for reporting violations, effluent violations, and failure to conduct repeat sampling after permit limits are exceeded. The Township is required to correctly identify all violations of its pretreatment program and follow-up with appropriate enforcement actions in accordance with approved enforcement response plan. (Section 10, Enforcement).
- Since the date of the Audit, Antrim has informed Grove of noncompliance both verbally (August 2014) and in writing via Notices of Violation (see Information Requirement Response #23 and Exhibit 23-1). In general, the Township will be more vigilant in identifying violations of its pretreatment program and will utilize the Enforcement Response Guide provided in Table 1 of their ERP as a means to determine the appropriate enforcement action.*
24. The file reviews revealed that at least Grove-Manitowoc Crane is in SNC for 2013. The Township is required to determine the appropriate actions necessary based on the SNC status and the approved enforcement response plan. In addition, the Township is required to publish a public notification in a newspaper of general circulation that provides meaningful public notice within the Township's jurisdiction of all SIUs in SNC as per the regulations at 40 CFR 403.8(f)(2)(viii) as soon as possible. Documentation of the publication must be submitted to EPA Region 3. (Section 10, Enforcement).
- The Township will review Grove's data from 2013 through 2016, document why they are in SNC and determine the appropriate enforcement response based on the SNC condition. Notification will be provided to Grove immediately upon Antrim's SNC determination. Additionally, the Township will publish a public notification of Grove's SNC pursuant to the regulations set forth at 40 CFR 403.8(f)(2)(viii) as soon as possible. Documentation of the publication will be submitted to EPA Region 3.*
25. Eldorado Stone could also be in SNC in 2013 for failure to sample for BOD and TSS as required by its permit. The Township is required to review all the data submitted by Eldorado

Stone and evaluate the facility for SNC status. The Township is required to submit its SNC determination and background data to EPA Region 3. (Section 10, Enforcement).

The Township will review all data from 2013 through 2016 and evaluate the SIU for SNC status. Upon completion of this evaluation, the Township will submit its SNC determination and supporting documentation used in making this determination to EPA Region 3.

26. The Township's data management of its pretreatment program files needs to be improved. The Township is required to review its data management procedures and ensure its procedures are adequate to comply with the federal requirements. At a minimum, all of the Township's program files must be readily accessible for review. (Section 11, Data Management).

With the assistance of its consultant, the Township is in the process of implementing a more organized approach to obtaining and managing the information/data required for implementation of its pretreatment program. The Township is currently utilizing new forms (inspection forms, industrial user discharge application forms, checklists, enforcement documents such as NOVs, etc.) that are more comprehensive than what was used previously to ensure all necessary information is available/obtained. The Township will keep both electronic and hard copies of its pretreatment program implementation documents, compliance monitoring results, correspondence, inspection reports, etc. to minimize the possibility of losing documents via software changes and to provide for easy access to the documents for the pretreatment coordinator(s) and regulatory officials. Hard copies of the aforementioned pretreatment documents will be kept in a single location (i.e. one filing cabinet designated for pretreatment documentation only) at the POTW.

27. The interview revealed that the Township does not have procedures for evaluating CBI requests. The Township is required to comply with the requirements at 40 CFR 403.14 the Township must have a formal process that provides for steps to accept, process, and manage such claims in the future. (Section 11, Data Management).

The Township will utilize its open records policy (a.k.a. right-to-know) as its mechanism for evaluating CBI requests. The Township and Authority have both adopted Right-to Know (RTK) Policies and designated RTK officers that process the requests. When a RTK request is received by the Township that may contain confidential information, the RTK officer will remove any material classified as confidential prior to releasing the records for review.

28. The Township is accepting electronic self-monitoring reports from its SIUs even though the Township has not been approved by EPA to do so. If the Township wants to accept electronic reports (which includes pdf files submitted by email) it is required to collect hardcopy reports (including original signature) from all SIUs until the Township has been approved to accept electronic reports; notify EPA's Office of Environmental Information that the Township is receiving electronic reporting; and follow up with all applicable standards and requirements related to receiving such reports. (Section 11, Data Management).

Effective immediately after completion of the Audit, the Township eliminated accepting electronic self-monitoring reports from its SIUs and began collecting hardcopy reports. Should the Township desire to accept electronic reports, the Township acknowledges that they are required to receive EPA-approval in order to do so and follow the requirements under 40 CFR Part 3 (Cross-Media Electronic Reporting Regulation, CROMERR).

12.2 Recommendations

29. The Township has adopted several of the optional streamlining rule pretreatment program provisions but has not developed SOPs for the provisions. It is strongly recommended that

the Township review its SUO and develop SOPs for all of the optional provisions that have been adopted to ensure consistency in implementation. (Section 4.1, Optional Streamlining Pretreatment Program Provisions).

The referenced "Section 4.1, Optional Streamlining Pretreatment Program Provisions" relative to this Recommendation is not provided in the Pretreatment Compliance Audit Summary Report. However, the Township will review its SUO and evaluate the need to develop SOPs for the optional streamlining rule provisions that have been adopted to ensure consistency in implementation.

30. Township personnel stated that they sent out industrial waste surveys to all commercial and nondomestic users in their service area in 2009. The Township should continue to review new business license applications and changes at existing businesses to ensure that it is aware of any new SIUs that must be regulated under its pretreatment program. (Section 6, Nondomestic Discharger Identification Characterization).

Acknowledged. The Township will continue to review new business license applications and changes at existing businesses to identify IUs that might be subject to their pretreatment program.

31. Both permits reviewed specified that the dischargers are required to notify the Township if there are increases in production. It is strongly recommended that the Township revise its notification of significant change statement to incorporate any changes in production. (Section 7.6, Notification of Significant Change).

Since the date of the Audit, the Township has begun using a new discharge permit form titled "Authorization to Discharge Wastewater" for its SIUs. The "Report of Changed Conditions" section of the new IU form addresses the recommended revision to its notification of significant change statement. The language used in the new IU permits is as follows:

"3. Report of Changed Conditions:

(a) Grove shall notify Antrim Township in writing at least 30 days in advance prior to the discharge of a new wastestream and/or any substantial change in the volume or character of pollutants in the discharge to the wastewater conveyance system in accordance with 40 CFR §403.12(j) and §111.35 of the Antrim Township Code. A new wastestream shall be considered any wastestream resulting from the manufacturing, packaging or processing of any product that has not been manufactured, packaged or processed within the last sixty (60) work days by Grove that will be discharged into the Antrim Township wastewater conveyance system. Written notification from Grove shall include: identification and estimated quantities and concentrations of the substances in the waste stream, estimation of specific waste stream flow, and estimation of waste stream discharge time. Antrim Township reserves the right to require additional monitoring of wastewater discharges by Grove in the event that Antrim Township determines that such is necessary.

(b) Antrim Township may require Grove to undertake a compatibility study to demonstrate to the satisfaction of Antrim Township that the wastewater to be discharged is compatible with the POTW treatment plant, will not affect any requirements imposed upon Antrim Township (including sludge disposal requirements) and will not adversely affect the POTW. Significant changes include, but are not limited to, flow increases of 25% or greater, and the discharge of any previously unreported pollutants."

32. The Township does not use permit fact sheets. It is strongly recommended that the Township develop permit fact sheets for each SIU or zero-discharging CIU. (Section 7.7 Fact Sheets)

Effective immediately, the Township will use permit fact sheets for each SIU or zero-discharging CIU. The Township will utilize the "Permit Fact Sheet Template" provided in Appendix D of EPA's Industrial User Permitting Guidance Manual (September 2012) as its standard and will modify it to each specific industrial user to best suit their needs. A copy of the Permit Fact Sheet Template is included under Attachment 9.

33. Since reliance on electronic copies of inspection reports has failed, it is recommended that the Township maintain paper copies of all documentation required to meet federal and local pretreatment program requirements. (Section 9 .1, Compliance Sampling).

The Township will maintain paper copies of all documentation required to meet federal and local pretreatment program requirements. See also response to Requirement #28.